



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME:** **WALIUR RAHMAN**

**MOS TAX:** [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

---

**Disclosure # 1:**

By a published decision and order in People v. Javier Pendley, 51 Misc. 3d 1217(A), 2016 N.Y. slip op. 50686(U) (Sup. Ct., Kings Cty.), dated April 21, 2016, Acting Justice ShawnDya Simpson, following a combined Huntley/Mapp/Dunaway hearing conducted in March of 2016, granted defendant's motion to suppress evidence.

Detective Walier Rahman, shield number 6428, the People's witness, testified that he entered defendant's building while pursuing individuals who had fled from an adjacent building where officers were executing search warrants. Inside defendant's building, Detective Rahman proceeded to the third floor where defendant resided. Detective Rahman testified that once he reached that floor, he saw the door to defendant's apartment - which was initially closed - open, and then observed defendant in the doorway, holding a clear ziplock bag of marihuana in plain view. Also in plain view, was a clear jar of marihuana on the apartment floor about four feet from the door. Detective Rahman specifically testified that the apartment door was opened spontaneously, without any officers announcing their presence or knocking or pounding on the door. Justice Simpson was 'not persuaded' by Detective Rahman's testimony, finding instead that the defendant's door was opened 'as a consequence of the police banging on his door.' The court found that the testimony failed to credibly establish that the door was opened spontaneously as Detective Rahman approached.

The court suppressed the marihuana and brief statements defendant made at the time of the encounter. The case against defendant Pendley, as well as a co-defendant found in the apartment, was subsequently dismissed and sealed.

**Disclosure # 2:**

MOS RAHMAN PLEAD GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES AND SPECIFICATONS:

1. SAID MOS WALIUR RAHMAN, WHILE ASSIGNED TO NARCOTICS BOROUGH BROOKLYN NORTH, ON OR ABOUT AND BETWEEN JULY 15, 2014 AND JANUARY 21, 2015, FAILED TO PROPERLY MAINTAIN HIS ACTIVITY LOG, TO WIT: MOS RAHMAN FAILED TO MAKE ENTRIES ON APPROXIMATELY 68 DATES, FAILED TO MAKE CHRONOLOGICAL ENTRIES ON APPROXIMATELY 68 OCCASIONS, MADE DUPLICATE ENTRIES ON FOUR DATES, REMOVED, OR CAUSED TO BE REMOVED, TWO PAGES FROM THE ACTIVITY LOG, FAILED TO MAKE COMPLETE ENTRIES ON APPROXIMATELY SIX

Eric Gonzalez  
District Attorney  
Kings County

DATES AND LEFT APPROXIMATELY NINE LINES BLANK.

2. SAID MOS WALIUR RAHMAN, WHILE ASSIGNED TO NARCOTICS BOROUGH BROOKLYN NORTH, ON OR ABOUT AND BETWEEN JULY 15, 2015 AND JUNE 26, 2015, FAILED TO PROPERLY MAINTAIN HIS ACTIVITY LOG, TO WIT: MOS RAHMAN FAILED TO MAKE ENTRIES ON THIRTY-TWO (32) DATES, MADE ENTRIES ON APPROXIMATELY TEN DATES THAT WERE OUT OF CHRONOLOGICAL ORDER, MADE DUPLICATE ENTRIES ON THREE DATES, MADE APPROXIMATELY SIX INCOMPLETE ENTRIES AND LEFT APPROXIMATELY TWENTY-THREE LINES BLANK.

3. SAID MOS WALIUR RAHMAN, WHILE ASSIGNED TO NARCOTICS BOROUGH BROOKLYN NORTH, ON OR ABOUT AND BETWEEN OCTOBER 25, 2014 AND NOVEMBER 20, 2014, ISSUED TWO DESK APPEARANCE TICKETS AND FAILED TO ENSURE THAT THE DESK APPEARANCE TICKET PAPERWORK WAS FORWARDED TO KINGS COUNTY CRIMINAL COURT.

4. SAID MOS WALIUR RAHMAN, WHILE ASSIGNED TO NARCOTICS BOROUGH BROOKLYN NORTH, ON OR ABOUT AND BETWEEN OCTOBER [REDACTED], 2014 AND DECEMBER [REDACTED] 2014, INCORRECTLY ENTERED THE DATES AND/OR DAYS IN THE NARCOTICS INVESTIGATION TRACKING OF RECIDIVIST OFFENDERS DATABASE OF APPROXIMATELY THREE [REDACTED] NARCOTICS' BUYS ACTION TAKEN: 5 VACATION DAYS

**Disclosure # 3:**

THE NYPD ENTERED A DISPOSITION OF OTHER MISCONDUCT NOTED AGAINST MOS RAHMAN DATED 1/3/2008 FOR THE FOLLOWING ALLEGATION:

1. DISPUTE TENANT/LANDLORD

ACTION TAKEN: "A" CD ISSUED

CASE CLOSED: 06/25/2008

**Disclosure # 4:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 11/12/18, AGAINST MOS RAHMAN:

1. FAIL TO SAFEGUARD DEPT EQUIPMENT - ID CARD – ACTIVE

2. MISSING DEPARTMENT EQUIPMENT - ID CARD – ACTIVE

3. FAIL TO SAFEGUARD DEPT EQUIPMENT - TRAIN PASS - METROCARD

4. MISSING DEPARTMENT EQUIPMENT - TRAIN PASS - METROCARD

CLOSED DATE : 2019-01-15

ACTION TAKEN : SCHEDULE A COMMAND DISCIPLINE

**Disclosure # 5:**

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 1/17/19, AGAINST MOS RAHMAN:

1. MISSING DEPARTMENT EQUIPMENT - PARKING PERMIT - RESTRICTED USE

2. FAIL TO SAFEGUARD DEPT EQUIPMENT - PARKING PERMIT - RESTRICTED USE

CLOSED DATE : 2019-03-06

ACTION TAKEN : SCHEDULE A COMMAND DISCIPLINE

**Disclosure # 6:**

THE PEOPLE ARE AWARE OF THE FOLLOWING FEDERAL CIVIL RIGHTS ACTION(S) AND/OR STATE TORT CIVIL LAWSUIT(S) IN WHICH THE INDICATED OFFICER HAS BEEN NAMED AS AN INDIVIDUAL DEFENDANT. NOTE, THE DISPOSITION INFORMATION MAY NOT BE CURRENT:

1. WILLIAM POAG AND SAFIYAL SOUZA V. CITY OF NY, ET AL, 000536/2014, FILED IN KINGS SUPREME

2. RACHELLE ELEY, SHAWNTAYA ELEY, KESHAWN, WIGGINS AND MANOUCHKA PIERRE V. CITY OF NY, ET AL, 006180/2014, FILED IN NEW YORK SUPREME

3. MANOUCHKA PIERRE AND LATAYA REID V. CITY OF NY, ET AL, 13CV07053, FILED IN KINGS SUPREME

4. AARON CHARLES V. CITY OF NY, ET AL, 15CV04510, FILED IN EASTERN DISTRICT

5. KASHIF ALLEYNE, DERRICK LOUIGARDE AND DAMANI MCFARLANE V. CITY OF NY, ET AL, 15CV01860, FILED IN EASTERN DISTRICT.

Eric Gonzalez  
District Attorney  
Kings County

6. CORY NELSON V. CITY OF NY, ET AL, 15CV04988, FILED IN EASTERN DISTRICT.
7. MAURICE COVINGTON V. CITY OF NY ET AL 15CV05329 FILED IN EASTERN DISTRICT

**THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND OR PENDING ALLEGATIONS  
AGAINST THIS OFFICER:**

**Disclosure # 7:**

CCRB CASE: 9501210

REPORT DATE : 03/24/1995

INCIDENT DATE: 03/23/1995

CCRB SUBSTANTIATED ALLEGATION(S):

1. Force - Gun Pointed